

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FCS ADVISORS, LLC,

Plaintiff,

—against—

21 Civ. 6995 (PKC)

THEIA GROUP, INC., d/b/a “THORIAN  
GROUP” and/or “CYPHERIAN”; THEIA  
AVIATION, LLC; and THEIA HOLDINGS  
A, INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

**DECLARATION OF KEVIN J. O’BRIEN**

KEVIN J. O’BRIEN hereby declares pursuant to 28 U.S.C. § 1746:

1. I am an attorney with the law firm of King & Spalding LLP and an attorney of record for Michael Fuqua (the “Receiver”) in the above-captioned action. I am a member in good standing of the bar of the State of New York and am admitted to practice before this Court.

2. Attached hereto as Exhibit B is a true and correct copy of the latest estimate of the cost to consummate the transactions and close the Receivership that the Receiver provided to LTS Systems, LLC and Brevet Capital Management, LLC, as described in the reply accompanying this Declaration.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on July 25, 2025

/s/ Kevin J. O’Brien

Kevin J. O’Brien